



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

February 2, 2017

**Re: Bron-Shoe Co.
Resolution of Violation (ROV)
Air Permit
Franklin County
OEPA ID # 0125040248**

Mr. Robert Kaynes, Jr.
Bron-Shoe Co.
1313 Alum Creek Drive
Columbus, OH 43209

Subject: Resolution of Violation

Dear Mr. Kaynes:

Thank you for your January 31, 2017 response to Ohio EPA's January 17, 2017 Notice of Violation (NOV) letter. The violations were originally communicated to you during an exit conference following the December 15, 2016 inspection.

Your response included documentation that showed that Bron-Shoe Co.'s was now tracking the 12-month rolling summation of individual and combined Hazardous Air Pollutants (HAP's).

Ohio EPA has reviewed the documentation that you provided and has determined that Bron-Shoe Co.'s has now resolved all the violations discovered during the December 15, 2016 inspection. To ensure that all the violations have been addressed, Ohio EPA has included Bron-Shoe Co.'s response for each violation and its status.

Resolution of Violation

Letter Citation: Finding 1

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track on a monthly basis the facilities rolling, 12-month summation of individual HAP's.

The documentation that was submitted on January 30, 2017, included revised spreadsheets of the facilities individual HAP's.

Letter Citation: Finding 2

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track on a monthly basis the facilities rolling, 12-month summation of combined HAP's.

The documentation that was submitted on January 30, 2017, included revised records of the facilities combined HAP's.

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Letter Citation: Finding 3

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track all the individual HAP's used in emission unit (EU) R002, Booth #2.

The documentation that was submitted on January 30, 2017, included revised records of the EU R002's individual HAP's.

Letter Citation: Finding 4

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track the combined HAP's used in emission unit R002, Booth #2.

The documentation that was submitted on January 30, 2017, included revised records of the EU R002's combined HAP's.

Letter Citation: Finding 5

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track all the individual HAP's used in emission unit R003, Booth #3.

The documentation that was submitted on January 30, 2017, included revised records of the EU R003's individual HAP's.

Letter Citation: Finding 6

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track the combined HAP's used in emission unit R003, Booth #3.

The documentation that was submitted on January 30, 2017, included revised records of the EU R003's combined HAP's.

Letter Citation: Finding 7

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track all the individual HAP's used in EU's K002, Booth #6; K003, Booth #7; and K005, Booth #8.

The documentation that was submitted on January 30, 2017, included revised records of the EU's K002, K003, and K005 individual HAP's.

Letter Citation: Finding 8

Rule Citation: The terms and conditions of FEPTIO P0109047 and Ohio Revised Code 3704.05(C). The failure to track the combined HAP's used in EU's K002, Booth #6; K003, Booth #7; and K005, Booth #8.

The documentation that was submitted on January 30, 2017, included revised records of the EU's K002, K003, and K005 combined HAP's.

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Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to Ohio Revised Code section ORC Section 3704.06 for the violation(s) noted in the January 17, 2017 NOV letter.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact John Walker by phone at (614) 728-3818 or by e-mail at john.walker@epa.ohio.gov.

Sincerely,



Bryon Marusek
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: Kelly Toth, Air Unit Manager, DAPC/CDO

ec: John Paulian, DAPC/CO
James Kavalec, DAPC/CO
Bryon Marusek, Permits Supervisor, DAPC/CDO
John Walker, DAPC/CDO

BM/ct 0125040248 BonShoe ROV from 2016 FCE

/ bc: Brian Dickens, USEPA, Region V